MARPOL Annex VI Regulation 18.2, as incorporated by reference in 40 C.F.R. § 1043.100, provides that a vessel not in compliance with the fuel oil sulfur standards will:

- "(1) present a record of the actions taken to attempt to achieve compliance; and
- (2) provide evidence that it attempted to purchase compliant fuel oil in accordance with its voyage plan and, if it was not made available where planned, that attempts were made to locate alternative sources for such fuel oil and that despite best efforts to obtain compliant fuel oil, no such fuel oil was made available for purchase."

Vessel's Name: Vessel's Flag: Identification Number: (IMO or other)

Voyage Plan

Port of Origin:
Port of Destination:
First U.S. Port of Arrival:

List of all port visits beginning with the Port of Origin and ending at Port of Destination:

1. Port of Origin:
2nd Port Visit:
3rd Port Visit:
4th Port Visit:
5th Port Visit:
6th Port Visit:
7th Port Visit:
8th Port Visit:
9th Port Visit:

(Insert more as needed)

Date and Time Vessel Received Notice it would transit the NA-ECA: Location of Vessel when notice was received it would transit the NA-ECA:

Date and Time vessel is expected to enter the NA-ECA:

Date and Time vessel is expected to exit the NA-ECA:

Projected number of days the main propulsion engines will be operated in the NA-ECA:

Sulfur Content of Fuel Oil used when entering the NA-ECA: Sulfur Content of Fuel Oil used while operating in the NA-ECA:

A description of the <u>actions taken</u> to attempt to achieve compliance prior to entering the North American ECA, <u>including a c</u> <u>description of the reason</u> why compliant fuel oil was not available (e.g., compliant fuel oil was not available at ports on "inte Note: The United States government does not consider the cost of compliant fuel oil to be a valid basis for claiming the non <u>dates on which the contact was made</u>.

While the MV 'Bulk Trident' was undergoing loading operations in Novorossisyk, RU we put in a Low-Sulphur Fuel Oil stell America ECA zone for discharging in New Orleans, LA. Although our order was to supply vessel with LSIFO and the delive bunker delivery receipt and so we sent a sample bottle for analysis, the results of indicated the so called LSIFO found to confirmed the fuel oil supplied to be off-spec, the vessel has already began transit on her transatlanic voyage.

In cases of fuel oil s	upply disruption, <u>t</u>	he name of the	port at which th	ne vessel wa	s scheduled to	receive complian	t fuel oil
N/A							
If applicable, identify are taking, to resolve The Operational conta sulphur content in	these operational	constraints that revent us from I	will allow you t	o use all cor	mmercially avai	lable residual fue	l oil blen

																	el oil, fo oil blen
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Disch	arge p	ort of I	New Or	leans c	urrent	ly has s	ufficie	nt supp	oly of co	omplai	nt LSIF	O and v	vill tak	e deliv	ery of c	omplai	nt fuel c

If compliant fuel oil is not available at the first port-of-call in the United States, <u>describe</u> the lowest sulfu States.	ur content of availab
N/A	

Fuel Oil Non-Availability Report

North American Emmissions Control Area (NA-ECA)

MV Bulk Trident Panama

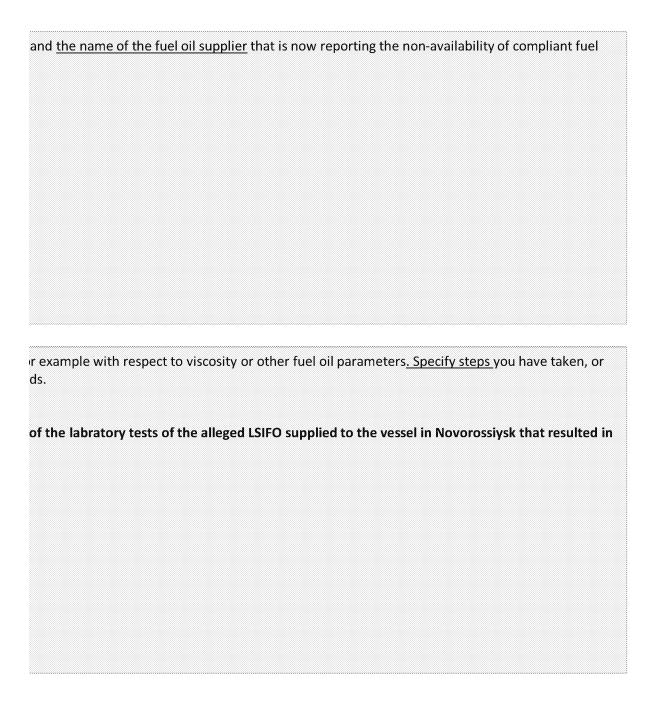
9298545

(Note: This plan should reflect what is in effect at the time of the vessel's entry into the North American ECA)

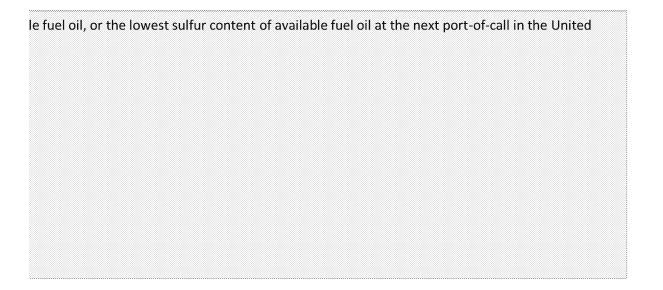
Novorossiysk, Russia New Orleans, LA USA New Orleans, LA USA

Novorossiysk, Russia New Orleans, LA USA (Port of Destination)

5/12/2014 Antwerp, Belgium 5-Jul-14 15-Jul-14 11 1.06% 1.06% (until vsl LSFO replenishment) <u>description</u> of all attempts that were made to locate alternative sources of compliant fuel oil, and <u>a</u> ended voyage;" fuel oil supply disruptions at port; etc. -availability of compliant fuel oil). Include names and addresses of the fuel oil suppliers contacted and the m for 165metric tons with bunker suppliers 'Transbunker Group' in anticipation of her calling North ry note of the said bunkers indicated content less than 1.0%, we, as prudent owners, did not rely on the contain a 1.08-1.09% sulphur content. Once this office received confirmation the tested fuel oil samples,



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If the vessel has	operated in the N	orth American EC	A in the prior 12 n	nonths, <u>provide</u> the	e names of all U.S	ports visited, the
Oct 12,2013- the	vessel called the	port of New Orle	ans for loading a	ing and was in con nd was in complair ; and was in compl	nce for all fuel oil	regulations.

If the vessel or owner/operator has submitted a Fuel Oil Non-Availability Report to the United States government in the preand provide details on the dates and ports previously visited while using non-compliant fuel oil.

Five previous submissions have been by the vessels owning company.

- 1. MV 'Mare Doro' Calling Honolulu on 06/05/13 where the vessel had to deviate to Honolulu for emergency repairs
- 2. MV 'Navios Galileo'- Calling Norfolk, VA on 12/26/13 where the vessel came from a previous port that did not have LSFO
- 3. MV 'Lake Dalia'- Transiting through Kauai Channel on 12/22/13. No LSIFO onboard and no availability at previous port of
- 4. Bulk Providence- Calling New Orleans on 04/17/14, the vessel was loading in Point Lisas, Trinidad and no LSIFO supply ava

<u>Provide</u> all relevant contact information, including the ship master, ship operator, legal agent in the United States, ship owner authorized to answer additional questions relating to claims of fuel oil unavailability and his or her full contact information.

Ship Master:

TO: MASTER M/V BULK TRIDENT

PH: 00870 773209916

Via telex: 453837961@internet-c.com VIA E-MAIL: v7ze5@globeemail.com master.BULKTRIDENT@globeemail.com

Ship Operator/Managers:
Phoenix Bulk Carriers (US) LLC
109 Long Wharf Newport, RI 02840
Email: Operations@phoenixbulkus.com

Technical Managment: Seamar Management S.A 90 Kifisias Avenue

151 25 Maroussi, Greece PH: +30-210-924-2131

Email: Operations.bulk@seamar.gr

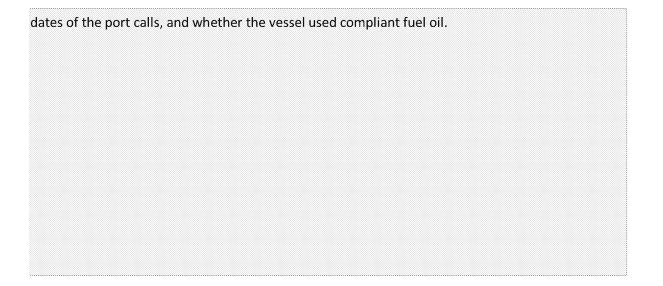
Corporate Official
David Reeve-Vice President of ops
Phoenix Bulk Carriers (US) LCC
Email: Dreeves@phoenixbulkus.com

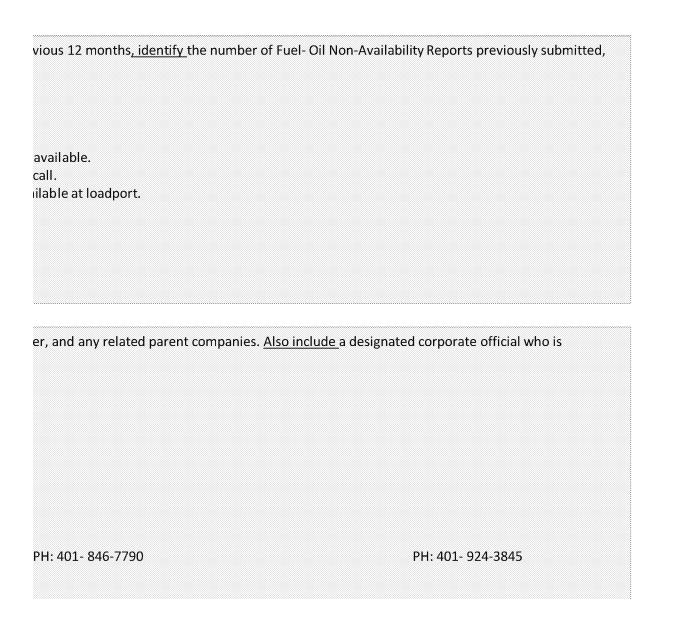
-	r the information submitted in a Fuel Oil Non- Availability Report to be reliable o
following affirmation:	
	tements and information made herein are, to the best of my knowledge and being the possibility of fines and imprisonment pursuant to 18 U.S.C. § 1001."
Signed: David Reeves	
Authorized Company Representative	
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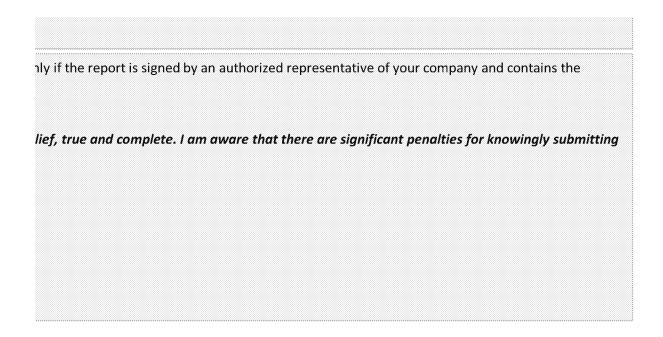
This completed and signed report should be sent to:

1. In the United States by email to:

2. To the vessel's Flag State Administrator







marine-eca@epa.gov